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Attorneys for VALLEY NATIONAL BANK

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA—WESTERN DIVISION

NYK BULK & PROJECTS CARRIER
LTD,

Plaintiff,

vs.

DELTA CORP SHIPPING PTE LTD,

Defendant.

Case No. 24-cv-8006-MRA-SK

**JOINT REQUEST FOR REMOTE
APPEARANCE AT THE
NOVEMBER 12, 2025, HEARING**

The garnishee Valley National Bank (“Garnishee”) and Plaintiff NYK Bulk & Projects Carrier Ltd., (“Plaintiff”) jointly request that lead counsel for both parties be permitted to appear remotely at the hearing on the Motion to Vacate the Maritime Attachment and Garnishment (the “Motion”), scheduled for November 12, 2025, at 10:00 a.m. [ECF No. 61].

1 Lead counsel for Garnishee resides and practices in New Jersey, and lead
2 counsel for Plaintiff resides in Maryland. Requiring personal appearances would
3 necessitate cross-country travel at substantial expense to both Garnishee and
4 Plaintiff.

5 WHEREFORE, Garnishee and Plaintiff jointly request that, if the Court holds
6 a hearing on the Motion, the Court permit counsel for both parties to appear
7 remotely—whether by videoconference, teleconference, or any other method as
8 directed by the Court.

9
10 Dated: October 28, 2025

K&L Gates LLP

11 By: /s/Jonathan P. Hersey

12 Jonathan P. Hersey

13 *Attorneys for Garnishee*
VALLEY NATIONAL BANK

14 Dated: October 28, 2025

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28 NYK BULK & PROJECTS
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STATEMENT OF ATTESTATION

Pursuant to Local Rule 5-4.3.4(a)(2)(i), I hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

By: /s/ Jonathan P. Hersey
Jonathan P. Hersey